

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES E. SHELTON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

VICTORY HOME REMODELING LLC,

Defendant.

:
:
:
:
:
:
:
:
:
:
:

Civil Action No. 24-4395

Judge Kelley B. Hodge

STIPULATION FOR EXTENSION OF TIME

As provided for in Local Civil Rule 7.4(b), plaintiff, James E. Shelton, and defendant, Victory Home Remodeling LLC, through their respective undersigned counsel, hereby stipulate to an extension of time – to and including October 4, 2024 – for Defendant to answer, plead or otherwise move in response to Plaintiff’s complaint, *provided however* that Defendant shall not file a motion to dismiss based upon improper service of the summons and complaint. No prior extensions have been granted by the Court in these proceedings.

Respectfully submitted,

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esquire
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, PA 19038
(215) 225-5529
a@perronglaw.com

Anthony Paronich, Esquire
(*Pro Hac Vice* forthcoming)
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(617) 485-0018
anthony@paronichlaw.com

Attorneys for Plaintiff

Respectfully submitted,

/s/ David H. Colvin

David H. Colvin, Esquire
Fox Rothschild LLP
2000 Market Street, 20th Floor
Philadelphia, PA 19103
(215) 299-2139
dcolvin@foxrothschild.com

*Attorneys for Defendant
Victory Home Remodeling LLC*

BY THE COURT:

HON. KELLEY B. HODGE, U.S.D.J.